

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

|                                |   |                          |
|--------------------------------|---|--------------------------|
| FIRST HORIZON BANK,            | ) |                          |
|                                | ) |                          |
| Plaintiff,                     | ) |                          |
|                                | ) |                          |
| RENASANT BANK,                 | ) |                          |
|                                | ) |                          |
| Intervenor-Plaintiff           | ) |                          |
|                                | ) |                          |
|                                | ) |                          |
| vs.                            | ) | CASE NO. 2:24-cv-605-RAH |
|                                | ) |                          |
| PREMIER HOLDINGS, LLC, et al., | ) |                          |
|                                | ) |                          |
| Defendants.                    | ) |                          |

---

|                       |   |                          |
|-----------------------|---|--------------------------|
| FIRST HORIZON BANK,   | ) |                          |
|                       | ) |                          |
| Plaintiff,            | ) |                          |
|                       | ) |                          |
| v.                    | ) | CASE NO. 2:24-cv-813-RAH |
|                       | ) |                          |
| PREMIER HOLDINGS, LLC | ) |                          |
|                       | ) |                          |
| Defendant.            | ) |                          |

**RECEIVER’S MOTION TO EXTEND DEADLINE TO FILE SECOND REPORT**

COMES NOW Moore Company Realty, Inc. receiver in the above-styled case (the “Receiver”), by and through counsel, and moves this Court to extend the deadline to file its second report for an additional ten (10) days and in support thereof, states the following:

1. The Receiver was appointed on January 6, 2025, pursuant to that certain *Order Granting First Horizon Bank’s Application for the Appointment of Receiver* (the “Order,” ECF Doc. 92).

2. The Order contained, in pertinent part, that the Receiver shall file period reports on its activities [and] subsequent reports shall be due every ninety (90) days thereafter. (Doc. 92 ¶ 21).

3. Upon information and belief, the deadline to file the second report occurs on **May 20, 2025**.

4. Although the Receiver has received substantial documentation, some of its document requests remain outstanding. Some of these outstanding document requests include the following:

**From the Defendants' Entities:**

a. Complete and full accounting records for both the Montgomery Property and the Harpersville Property;

b. Bank account records including, but not limited to, copies and itemization of all deposits, checks, wires, eft, ACH, transfers, loan payments and the corresponding payees and payors;

c. Full (and revised) tax returns, financial audits and supporting workpapers for 2022, 2023, and 2024; and

d. Copy of the survey and other due diligence information relevant to the disposition of the Harpersville Property.

5. Receipt of this information is pivotal in assisting the Receiver in determining the next steps as defined in the Order.

6. By extending the deadline to file the second report, it will give the Receiver additional time to receive its requested information and review the above and outstanding documentation.

7. No party in interest should be harmed if this motion is granted.

WHEREFORE, the Receiver, Moore Company Realty, Inc. requests a ten (10) day extension to file its second period report with the Court and requests such other and further relief as may be just.

Respectfully submitted this 19th day of May, 2025.

/s/ Wm. Wesley Causby

Stuart H. Memory  
ASB-2214-Y36V

Wm. Wesley Causby  
ASB-9822-G93R

MEMORY MEMORY & CAUSBY, LLP  
P.O. Box 4054  
Montgomery, Alabama 36103  
Phone: 334-834-8000  
Fax: 334-834-8001  
Email: wcausby@memorylegal.com

Counsel for the Receiver,  
Moore Company Realty, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing motion has been served on all interested parties by Notice of Electronic Filing on this the 19th day of May, 2025.

/s / Wm. Wesley Causby